

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA	:	Hon. John Michael Vazquez
	:	
v.	:	Crim. No. 20-578 (JMV)
	:	
JEFFREY ANDREWS,	:	
CHAD BEENE,	:	
ADAM BROSIUS, and	:	
ROBERT SCHNEIDERMAN	:	

**DEFENDANT CHAD BEENE’S OPPOSED MOTION IN LIMINE REQUESTING
CAUTIONARY INSTRUCTION REGARDING COOPERATING WITNESSES
RELATED TO MAIN AVENUE PHARMACY**

TO THE HONORABLE JUDGE OF SAID COURT:

Chad Beene moves to exclude at trial evidence outside the scope of the charged conduct. The scope of the indictment in this case relates to the operations of Scripts Pharmaceutical and Main Avenue Pharmacy from March 2014 and June 2016. Mr. Beene anticipates that the government will seek to introduce evidence of alleged misconduct regarding the conduct of the business of these entities. Mr. Beene moves to exclude any testimony or evidence related to any misconduct alleged regarding Main Avenue Pharmacy and Scripts Pharmaceutical.

Individuals related to the allegations of misconduct with regard to Main Avenue and Scripts overlap with some of the individuals involved in this case. Admitting any evidence of misconduct with respect to these entities would be overly prejudicial to Mr. Beene. Rule 403 provides that the court may exclude relevant evidence if its probative value is substantially outweighed by one or more of the following: unfair prejudice, confusing the issues, misleading the jury, undue delay, wasting time, or needlessly presenting cumulative evidence.

For the reasons stated, Chad Beene’s Motion in Limine Requesting the Court to exclude evidence outside the scope of the conduct alleged in the Indictment should be granted.

Based on the foregoing, Defendant Chad Beene prays this Court grant his Motion in Limine and such other relief, in law and equity, to which he is justly entitled.

Dated: December 15, 2021

Respectfully submitted,

GREGOR | WYNNE | ARNEY, PLLC

By: /s/ Michael J. Wynne*
Michael J. Wynne

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** Admitted pro hac vice*

COUNSEL FOR CHAD BEENE

CERTIFICATE OF SERVICE

I certify that a true and correct copy of this document was served upon counsel of record on this 15th day of December 2021.

By: /s/ Michael J. Wynne*
Michael J. Wynne

CERTIFICATE OF CONFERENCE

I certify that I have communicated with lead counsel for the United States and that the United States is opposed to this motion.

By: /s/ Michael J. Wynne*
Michael J. Wynne